

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

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|-----------------------------------|---|-----------------------|
| IN RE | : | CHAPTER 11 |
| | : | |
| RMG SPORTS GROUP INC., | : | |
| | : | CASE NO. 23-52472-WLH |
| | : | |
| DEBTOR. | : | |
| | | |
| | : | |
| MARY IDA TOWNSON, | : | |
| UNITED STATES TRUSTEE, REGION 21, | : | |
| | : | |
| MOVANT, | : | |
| | : | |
| -vs- | : | CONTESTED MATTER |
| | : | |
| RMG SPORTS GROUP INC., | : | |
| | : | |
| RESPONDENT. | : | |

UNITED STATES TRUSTEE’S MOTION TO DISMISS CASE

Mary Ida Townson, United States Trustee for Region 21, in furtherance of the administrative responsibilities imposed by 28 U.S.C. § 586(a), moves the Court to dismiss this case for cause pursuant to 11 U.S.C. § 1112(b) and shows as follows.

1. On March 15, 2023, RMG Sports Group Inc (“Debtor”) commenced this case by filing a voluntary petition for relief under chapter 11 of the Bankruptcy Code (the “Petition”).

2. Norman Royell Washington signed the Petition as President of the Debtor.

3. A search of the Georgia Secretary of State website conducted on March 15, 2023, revealed that Norman Washington is listed as the CEO of the Debtor and that the

Debtor last filed its annual registration in 2021.

4. According to the search of the Georgia Secretary of State website, the Debtor dissolved on October 28, 2022.

5. The Petition was not signed by an attorney representing the Debtor.

6. It appears on the face of the petition that Debtor is an artificial entity and that it is not represented by an attorney.

7. Because Debtor is an artificial entity, it cannot represent itself in this proceeding, nor may its officers appear before this court on its behalf unless they are licensed attorneys. *See Palazzo v. Gulf Oil Corp.*, 764 F.2d 1381, 1385 (11th Cir. 1985); *National Indep. Theatre Exhibitors, Inc. v. Buena Vista Distrib. Co.*, 748 F.2d 602, 609 (11th Cir. 1984).

WHEREFORE, the United States Trustee respectfully moves the Court to dismiss this case and grant such other relief as the Court deems just and proper.

MARY IDA TOWNSON
UNITED STATES TRUSTEE
REGION 21

/s/
Alan Hinderleider
Trial Attorney
Georgia Bar No. 938543
Office of the United States Trustee
362 Richard Russell Building
75 Ted Turner Drive, SW
Atlanta, Georgia 30303
(404) 331-4464
Alan.Hinderleider@usdoj.gov

CERTIFICATE OF SERVICE

This is to certify that I have on this day electronically filed the foregoing *United States Trustee's Motion to Dismiss Case* using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of this document and an accompanying link to this document to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program:

- **Tamara M. Ogier (Sub V Trustee)** tmo@orratl.com,
jc@orratl.com;
tmo@trustesolutions.net;
ctmol1@trustesolutions.net

I further certify that on this day, I caused a copy of this document to be served via United States First Class Mail, with adequate postage prepaid on the following parties at the address shown for each.

RMG Sports Group Inc
4707 Ashford Dunwoody Rd
Atlanta, GA 30338

_____/s/
Alan Hinderleider
Georgia Bar No. 938543
United States Department of Justice

Office of the United States Trustee
362 Richard B. Russell Building
75 Ted Turner Drive, SW
Atlanta, Georgia 30303
(404) 331-4464
Alan.Hinderleider@usdoj.gov